

Laurence D. King (SBN 206423)
 Matthew B. George (SBN 239322)
 Mario M. Choi (SBN 243409)
KAPLAN FOX & KILSHEIMER LLP
 350 Sansome Street, Suite 400
 San Francisco, CA 94104
 Telephone: 415-772-4700
 Facsimile: 415-772-4707
lking@kaplanfox.com
mgeorge@kaplanfox.com
mchoi@kaplanfox.com

Frederic S. Fox (*pro hac vice*)
 Donald R. Hall (*pro hac vice*)
KAPLAN FOX & KILSHEIMER LLP
 850 Third Avenue, 14th Floor
 New York, NY 10022
 Telephone: 212-687-1980
 Facsimile: 212-687-7714
ffox@kaplanfox.com
dhall@kaplanfox.com

[Additional Attorneys on Signature Page]

Attorneys for Plaintiffs and the Classes

Angela C. Agrusa (SBN 131337)
angela.agrusa@dlapiper.com
 Shannon E. Dudic (SBN 261135)
shannon.dudic@dlapiper.com
DLA PIPER LLP (US)
 2000 Avenue of the Stars, Suite 400
 North Tower
 Los Angeles, CA 90067
 Telephone: 310-500-3500
 Facsimile: 310-500-3300

Charles C. Cavanagh (SBN 198468)
ccavanagh@messner.com
MESSNER REEVES LLP
 1430 Wynkoop Street, Suite 300
 Denver, CO 80202
 Telephone: 303-623-1800
 Facsimile: 303-623-0552

Attorneys for Defendant
Chipotle Mexican Grill, Inc.

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION**

MARTIN SCHNEIDER, SARAH
 DEIGERT, THERESA GAMAGE, and
 NADIA PARIKKA, Individually and on
 Behalf of All Others Similarly Situated,

Plaintiffs,

v.

CHIPOTLE MEXICAN GRILL, INC., a
 Delaware Corporation,

Defendant.

Case No. 4:16-cv-02200-HSG (KAW)

**NOTICE OF SETTLEMENT AND JOINT
 STIPULATION AND REQUEST TO
 VACATE DATES AND [PROPOSED]
 ORDER SETTING DATE TO FILE
 MOTION FOR PRELIMINARY
 APPROVAL OF SETTLEMENT**

Judge: Hon. Haywood S. Gilliam, Jr.
 Ctrm: 2, 4th Floor
 Next Hearing: July 18, 2019
 Time: 2:00 p.m.

1 Plaintiffs Martin Schneider, Sarah Deigert, Theresa Gamage, and Nadia Parikka
 2 (“Plaintiffs”) and Defendant Chipotle Mexican Grill, Inc. (“Defendant,” and with Plaintiffs, the
 3 “Parties”) hereby inform the Court that, after a second all-day mediation on July 2, 2019 with the
 4 Hon. Jay C. Gandhi (Ret.) of JAMS, the Parties have reached and executed a settlement term
 5 sheet as to the core terms of a class action settlement that will resolve all claims against
 6 Defendant. After the Parties finalize the remaining details and terms, they will then execute a
 7 formal, comprehensive class action settlement agreement.

8 Accordingly, the Parties, by and through their attorneys, hereby jointly stipulate and
 9 request that the Court approve the following:

10 1. In light of the execution of the settlement term sheet by the Parties to settle this
 11 action, all pending dates, including the hearing on Defendant’s Motion to Decertify the Classes,
 12 currently scheduled for July 18, 2019, should be vacated.

13 2. Plaintiffs will submit their Motion for Preliminary Approval of the settlement
 14 within 45 days of the Court’s approval of this Stipulation.

15 **IT IS SO STIPULATED.**

16
 17
 18 DATED: July 3, 2019

Respectfully submitted,

KAPLAN FOX & KILSHEIMER LLP

19 By: /s/ Laurence D. King
 20 Laurence D. King

21 Laurence D. King (SBN 206423)
 22 Matthew B. George (SBN 239322)
 23 Mario M. Choi (SBN 243409)
 24 350 Sansome Street, Suite 400
 25 San Francisco, CA 94104
 26 Telephone: 415-772-4700
 27 Facsimile: 415-772-4707
 28 *lking@kaplanfox.com*
mgeorge@kaplanfox.com
mchoi@kaplanfox.com

KAPLAN FOX & KILSHEIMER LLP

Frederic S. Fox (*pro hac vice*)
Donald R. Hall (*pro hac vice*)
850 Third Avenue, 14th Floor
New York, NY 10022
Telephone: 212-687-1980
Facsimile: 212-687-7714
ffox@kaplanfox.com
dhall@kaplanfox.com

KOBRE & KIM LLP

Matthew I. Menchel (*pro hac vice*)
201 South Biscayne Boulevard, Suite 1900
Miami, FL 33131
Telephone: 305-967-6108
matthew.menchel@kobrekim.com

KOBRE & KIM LLP

Hartley M. K. West (SBN 191609)
150 California Street, 19th Floor
San Francisco, CA 94111
Telephone: 415-582-4781
Facsimile: 415-582-4811
hartley.west@kobrekim.com

Attorneys for Plaintiffs and the Classes

DATED: July 3, 2019

DLA PIPER LLP (US)

By: /s/ Angela C. Agrusa
Angela C. Agrusa

Angela C. Agrusa (SBN 131337)
angela.agrusa@dlapiper.com
Shannon E. Dudic (SBN 261135)
shannon.dudic@dlapiper.com
2000 Avenue of the Stars, Suite 400 North Tower
Los Angeles, CA 90067
Telephone: 310-500-3500
Facsimile: 310-500-3300

Charles C. Cavanagh (SBN 198468)
ccavanagh@messner.com

MESSNER REEVES LLP

1430 Wynkoop Street, Suite 300
Denver, CO 80202
Telephone: 303-623-1800
Facsimile: 303-623-0552

Attorneys for Defendant Chipotle Mexican Grill, Inc.

[PROPOSED] ORDER

Good cause appearing, the foregoing NOTICE OF SETTLEMENT AND JOINT STIPULATION AND REQUEST TO VACATE DATES AND [PROPOSED] ORDER SETTING DATE TO FILE MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT (“Stipulation”) is approved and it is hereby ORDERED that:

1. All pending dates, including the hearing on Defendant’s Motion to Decertify the Classes, are VACATED.
2. Plaintiffs will file their motion for preliminary approval of the settlement no later than 45 days after entry of this Order.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: _____

HON. HAYWOOD S. GILLIAM, JR.
United States District Court Judge

ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)

I, Mario M. Choi, attest that concurrence in the filing of this document has been obtained from the other signatories. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 3rd day of July, 2019, at San Francisco, California.

/s/ Mario M. Choi
Mario M. Choi